## UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF MASSACHUSETTS

AMY TUTEUR, M.D.,	
Plaintiff,	)
v.	Civil Action No.: 13-cv-10159-MBE
GINA CROSLEY-CORCORAN,	)
Defendant.	)
	J

## AFFIDAVIT OF AMY TUTEUR, M.D.

I Amy Tuteur, M.D., do hereby depose and state as follows:

- 1. Unless otherwise stated, I make this affidavit of my own personal knowledge.
  - 2. I am a resident of Sharon, Massachusetts.
- 3. I received my undergraduate degree from Harvard College in 1979 and my medical degree from Boston University School of Medicine in 1984. Thereafter, I practiced obstetrics and gynecology at both Beth Israel Hospital and Brigham and Women's Hospital.
- 4. As an attending physician at Beth Israel Hospital and Brigham and Women's Hospital, I worked closely with many of the country's top physicians, delivered thousands of babies, and gained valuable, first-hand knowledge about the serious risks posed to both mother and baby during childbirth, especially when such births are performed at home rather than in a hospital.
- 5. I left active practice in 1994 to raise my family, but I have remained involved in my field. For example, I have been invited to speak at the annual conference

of the American College of Obstetricians & Gynecologists (Western Region) in September 2013, on the topic of homebirth.

- 6. Time Magazine invited me to be a columnist in its online Ideas section, where I currently maintain my own Ideas page: http://ideas.time.com/contributor/amytuteur-m-d/.
- 7. My work has been recognized in the New York Times, the L.A. Times, the Times of London, the Boston Globe, NPR, the Daily Beast, and Newsweek, among other news outlets.
- 8. I am the author of the first fully-illustrated guide to pregnancy & childbirth: How your Baby is Born (Ziff-Davis Press 1994).
- 9. Given the needless, serious risks to mother and child associated with home births, I am deeply troubled by uninformed advocates who attempt to convince women that the risks are in fact not serious and should be ignored. Accordingly, in 2006, I started a blog known as the "Homebirth Debate," renamed "The Skeptical OB" (http://www.skepticalob.com) in 2008.
- 10. The publicly-available registration information for The Skeptical OB includes my home address in Sharon, Massachusetts, as it has since at least 2011.
- 11. Upon information and belief, Ms. Crosley-Corcoran's blog, The Feminist Breeder, has subscribers throughout the country, including within Massachusetts, some of whom actively participate in her blog and/or purchase merchandise from her online store.
- 12. From mid-December 2012, when I received notice that Crosley-Corcoran issued her first takedown notice to my webhost, Bluehost.com, through January 25, 2013, when I commenced this action, I spent more than 50 hours working from my home in

Massachusetts trying to keep The Skeptical OB online. This work included, among other things, exchanging myriad communications with my webhosts, conducting research to find acceptable alternative webhosts, investigating various ways to prevent Crosley-Corcoran from interfering with my website, and responding to inquiries from concerned readers of The Skeptical OB about the service outages caused by Crosley-Corcoran.

Signed under the penalties of perjury this 5th day of April 2013.

Amy Tuteur, M.D.